26

RENE L. VALLADARES Federal Public Defender State Bar No. 11479 LARONDA MARTIN Assistant Federal Public Defender 411 E. Bonneville, Ste. 250 Las Vegas, Nevada 89101 (702) 388-6577/Phone (702) 388-6261/Fax LaRonda Martin@fd.org

Attorney for Nancy Kay Shedleski

UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

V.

NANCY KAY SHEDLESKI,

Defendant.

Case No. 2:22-cr-00092-JCM-EJY

STIPULATION TO CONTINUE
SENTENCING HEARING
(Third Request)

IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson, United States Attorney, and Mina Chang, Assistant United States Attorney, counsel for the United States of America, and Rene L. Valladares, Federal Public Defender, and LaRonda Martin, Assistant Federal Public Defender, counsel for Nancy Kay Shedleski, that the Sentencing Hearing currently scheduled on March 29, 2023, be vacated and continued to a date and time convenient to the Court, but no sooner than sixty (60) days.

This Stipulation is entered into for the following reasons:

- 1. Defense counsel needs additional time to prepare mitigation in support of the Sentencing Hearing.
- 2. Defendant Shedleski is seventy-one (71) years old. On January 6, 2023, Dr. Yumiaco and Dr. Golden diagnosed a mass in her lung as adenocarcinoma.

- 3. Ms. Shedleski advised counsel she that told her doctor that she was experiencing a burning pain in her L-Breast to back. According to Dr. Diamandidis, the pain is related to her tumor. Ms. Shedleski further advised that efforts are being conducted to schedule her for mass removal through surgery with follow-up treatment.
- 4. According to the medical records received, Ms. Shedleski is scheduled for medical appointments on March 15, 2023 and March 29, 2023 with The Oncology Institute of Hope and Innovation. She expects the oncologist, Dr. Dimitrios Diamandidis, M.D., will advise her on the next course of treatment.
- 5. Undersigned counsel requests the additional time to allow Ms. Shedleski to continue receiving the necessary treatment for her cancer before serving her incarcerated period in the Bureau of Prisons.
 - 6. The defendant is not in custody and agrees with the need for the continuance.
 - 7. The parties agree to the continuance.

This is the third request for a continuance of the sentencing hearing.

DATED this 14th day of March, 2023.

RENE L. VALLADARES
Federal Public Defender

JASON M. FRIERSON United States Attorney

By <u>/s/ LaRonda Martin</u>
LARONDA MARTIN
Assistant Federal Public Defender

By /s/ Mina Chang
MINA CHANG
Assistant United States Attorney

UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

v.

NANCY KAY SHEDLESKI,

Defendant.

Case No. 2:22-cr-00092-JCM-EJY

ORDER

IT IS THEREFORE ORDERED that the sentencing hearing currently scheduled for Wednesday, March 29, 2023 at 10:00 a.m., be vacated and continued to **May 31, 2023, at 11:00 a.m.**; or to a time and date convenient to the court.

DATED March 15, 2023.

UNITED STATES DISTRICT JUDGE